

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ELYSE MCKENNA,

Plaintiff,

v.

ROBERT F. RILEY and  
RILEY & HURLEY, PC and  
OLSMAN MACKENZIE PEACOCK, PC

Defendants.

Case No. 24-cv-12347

Hon. Brandy R. McMillion

Magistrate Judge Elizabeth  
Stafford

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**PLAINTIFF'S ANSWERS TO RILEY DEFENDANTS'**  
**FIRST SET OF INTERROGATORIES**

Plaintiff Elyse McKenna answers the Riley Defendants' First Set of Interrogatories, pursuant to Federal Rule of Civil Procedure 33.

**PLAINTIFF'S PRELIMINARY STATEMENT IN RESPONSE TO  
RILEY DEFENDANTS' INTERROGATORIES**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**INTERROGATORY NO. 3:** Provide the following information for each doctor, health care provider, medical practitioner, physical therapist, psychiatrist, psychologist, psychological therapist, counselor, social worker, or clergy with whom Plaintiff has consulted or been treated for (1) any physical illness at any time during the last ten years; or (2) any mental or emotional illness or condition at any time during your adulthood:

- a. Name of provider (name of individual and of clinic or group), address, and telephone number;

- b. Date of first contact; and
- c. Date of last and latest contact.

Please also properly execute and return the attached authorization for release of records for each doctor, health care provider, medical practitioner, physical therapist, psychiatrist, psychological therapist, counselor, social worker, hospital, or medical institution identified in response to this Interrogatory. (*See Request for Production No. 64*)

**ANSWER:** Plaintiff objects to this interrogatory on the grounds that it is overbroad in scope and time, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, invasive of Plaintiff's privacy rights, and not proportional to the needs of the case under Federal Rule of Civil Procedure 26(b)(1). The request improperly seeks the identification of all medical and mental health treatment Plaintiff has received since 2015, regardless of its relevance to the claims or defenses in this case, and regardless of whether it involves the alleged conduct at issue. The interrogatory is also objected to on the basis that it seeks information protected by the physician-patient privilege, the psychotherapist-patient privilege, and/or other applicable confidentiality protections, including under HIPAA, particularly as it relates to treatment unrelated to emotional distress claims asserted in this matter. Subject to and without waiving these objections, Plaintiff identifies the following providers who

treated her for emotional issues related to the events in question, and will agree to execute appropriate authorizations as to those providers, which will be produced within 14 days:

- [REDACTED] (approximate dates February 2023-February 2024)
- [REDACTED] (approximate dates June 2024 – Present)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]